

Sara Siegall

From: Sara Siegall
Sent: Sunday, March 17, 2019 9:19 PM
To: 'LCaseria@sheppardmullin.com'
Cc: Peter Spingola; Patrick Manion
Subject: RE: In re: Dealer Management Systems Antitrust Litigation, Case No. 1:18-cv-864/MDL No. 2817

Leo:

After conferring with AKKR, we were not able to identify any means of isolating the categories of documents you specified during our March 11, 2019 teleconference without reviewing the same 40,000+ emails and additional non-email ESI responsive to basic search terms drawn from the subpoenas (*i.e.*, MVSC, CDK, EVR, CVR, Vitu, DMVDesk, “Motor Vehicle Software Corporation”, and “electronic vehicle registration”).

Even if AKKR, notwithstanding its relevance objection, were willing to produce the categories of information you articulated (which is not the case), the proposed means of narrowing the subpoenas would not materially lessen the burden on AKKR in any event,

I appreciate your efforts to work out a compromise. However, we are at impasse.

Best wishes,

Sara

Sara Siegall

Partner

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Chicago, IL 60603
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On Tue, Mar 12, 2019 at 12:46 PM Leo Caseria <LCaseria@sheppardmullin.com> wrote:

Thanks Sara, sounds good.

Leo D. Caseria | Partner
+1 213-617-4206 | direct
LCaseria@sheppardmullin.com | [Bio](#)

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EXHIBIT 7

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From: Sara Siegall <ssiegall@chapmanspingola.com>

Sent: Tuesday, March 12, 2019 10:45 AM

To: Leo Caseria <LCaseria@sheppardmullin.com>

Cc: Peter Spingola <pspingola@chapmanspingola.com>; Patrick Manion <pmanion@chapmanspingola.com>

Subject: RE: In re: Dealer Management Systems Antitrust Litigation, Case No. 1:18-cv-864/MDL No. 2817

Leo:

Thanks for your time on the phone yesterday. Just confirming our extension, to March 22, 2019, to respond to the document subpoena.

In the meantime, I will discuss with AKKR the issues raised during our call yesterday and will get back to you as soon as possible.

Best wishes,

Sara

Sara Siegall

Partner

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From: Leo Caseria <LCaseria@sheppardmullin.com>
Sent: Friday, March 8, 2019 2:21 PM
To: Sara Siegall <ssiegall@chapmanspingola.com>
Cc: Peter Spingola <pspingola@chapmanspingola.com>; Patrick Manion <pmanion@chapmanspingola.com>
Subject: RE: In re: Dealer Management Systems Antitrust Litigation, Case No. 1:18-cv-864/MDL No. 2817

Ok, that time works for me.

Leo D. Caseria | Partner
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From: Sara Siegall <ssiegall@chapmanspingola.com>
Sent: Friday, March 8, 2019 12:20 PM
To: Leo Caseria <LCaseria@sheppardmullin.com>
Cc: Peter Spingola <pspingola@chapmanspingola.com>; Patrick Manion <pmanion@chapmanspingola.com>
Subject: RE: In re: Dealer Management Systems Antitrust Litigation, Case No. 1:18-cv-864/MDL No. 2817

Leo:

Does 2:00 pacific/4:00 central work on Monday? During our call, we can also discuss the deposition subpoena to AKKR, which AKKR objects to on the same grounds as the document subpoena.

Thanks,

Sara

Sara Siegall

Partner

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From: Leo Caseria <LCaseria@sheppardmullin.com>

Sent: Thursday, March 7, 2019 9:11 PM

To: Sara Siegall <ssiegall@chapmanspingola.com>

Cc: Peter Spingola <pspingola@chapmanspingola.com>; Patrick Manion <pmanion@chapmanspingola.com>

Subject: RE: In re: Dealer Management Systems Antitrust Litigation, Case No. 1:18-cv-864/MDL No. 2817

Sara,

Please see the attached letter. I am available for a telephonic meet and confer on Monday, 9 a.m. pacific or later. Let me know what works for you.

Leo

Leo D. Caseria | Partner

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From: Sara Siegall <ssiegall@chapmanspingola.com>
Sent: Wednesday, March 6, 2019 7:52 AM
To: Leo Caseria <LCaseria@sheppardmullin.com>
Cc: Peter Spingola <pspingola@chapmanspingola.com>; Patrick Manion <pmanion@chapmanspingola.com>
Subject: RE: In re: Dealer Management Systems Antitrust Litigation, Case No. 1:18-cv-864/MDL No. 2817

Leo:

Please see the attached letter concerning the subpoena to Accel-KKR Capital Partners IV, LP in the above-referenced case.

Are you available to discuss tomorrow afternoon? If not, please provide some alternative times within the next few days.

Thanks,

Sara

Sara
Siegall

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From: Leo Caseria <LCaseria@sheppardmullin.com>
Sent: Wednesday, February 20, 2019 10:20 AM
To: Sara Siegall <ssiegall@chapmanspingola.com>
Cc: Peter Spingola <pspingola@chapmanspingola.com>
Subject: RE: In re: Dealer Management Systems Antitrust Litigation, Case No. 1:18-cv-864/MDL No. 2817

Hi Sara, defendants are fine with extending Accel-KKR's response deadline to March 15, 2019. Thanks.

Leo

Leo D. Caseria | Partner
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LCaseria@sheppardmullin.com | [Bio](#)

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From: Sara Siegall <ssiegall@chapmanspingola.com>
Sent: Monday, February 18, 2019 2:47 PM
To: Leo Caseria <LCaseria@sheppardmullin.com>
Cc: Peter Spingola <pspingola@chapmanspingola.com>
Subject: In re: Dealer Management Systems Antitrust Litigation, Case No. 1:18-cv-864/MDL No. 2817

Leo:

Good afternoon. This email follows my voice message to you a moment ago. Our firm is representing Accel-KKR with respect to the subpoena it received in the above captioned matter. I see that the stated response deadline is this week, February 22.

We ask that you kindly agree to a 21-day extension of time, to March 15, 2019, for Accel-KKR to respond. Please confirm that this is acceptable.

Thank you,

Sara

Sara Siegall

Partner

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